of Blonstein et al, U.S. Patent No. 5,319,724. It is respectfully submitted that apparatus claims 1-5, as filed, distinguish over these references singly, and in combination for the following reasons.

First, and perhaps foremost, claim 1, and therefore dependent claims 2-5, include the limitation of a "centralized computer storing a database of compressed image files," wherein verification of information entered at a remote terminal relies "at least in part on an image filed stored at the centralized computer."

The system of Piosenka et al is entirely different, such that, even in combination with Blonstein, the present invention is by no means made obvious. According to Piosenka et al,

> "An unforgeable personal identification system positively identifies users at a remote access control site. The identification system includes apparatus for generating encrypted physically immutable identification credentials of a user. These credentials are then stored on a portable memory device.
>
> The remote access control site reads the encrypted identification credentials from the portable memory device. Next, the user has his actual physical characteristics input to the access control site via a physical trait input device. Lastly, the identification credentials input directly from the user and those input via the portable memory device are compared. If the comparison is successful, the requested access is granted to the user. Otherwise, the requested access is denied by the remote access control site."

According to this definition, the system of Piosenka et al therefore represents a more secure way of carrying out the prior-art technique of encrypting personal identification information and storing it on a portable memory device. Such techniques are recognized and disclosed by the instant application in the Applicant's Background

of the Invention.

The approach taken by the instant application is entirely different. The Examiner states on page 3, paragraph 4 of the Office Action that Piosenka et al discloses "at least one centralized computer (trusted computer system - 1) storing a database of image (see column 5, lines 28-30) ... the verification of the information relying at least in part on an image file stored at the centralized computer (see column 5, lines 28-38) ...". Applicant respectfully disagrees. Turning to column 5, lines 28-38 of Piosenka et al, the following paragraph is set forth:

> "Each of the digitized physical trait data which is required for identification by the system is then transmitted to the trust computer system 1. This data is then formatted according to a specified predetermined format. In addition, data entered via the digitizing scanner 10 or keyboard 50 may be included in the data to be placed on the identification credentials. This optional attribute data may include information which the authorizing agency wishes to include as part of the credentials. Examples of this optional data are name, social security number, age, sex and hair color.

Thus, rather than making comparisons with an image filed in the central database, the system of Piosenka et al simply produces a portable memory card, albeit a more sophisticated card and less subject to unauthorized hampering. Nevertheless, a centralized image file is not taught by this reference. Such that, even in combination of Blonstein et al, the present invention, as claimed, must not be considered obvious.

Despite the broader deficiencies of the prior art, the Applicant also takes issue with the Examiner's conclusion that, although Piosenka et al failed to disclose that the images stored in

a database are compressed image files, that the combination of Blonstein et al teaches that images should be compressed to save on memory or transmission bandwidth. However, since the Piosenka et al patent is not related to the creation of a centralized image database, particularly one wherein such images are compiled from remote sources, there would be no impetuous according to Piosenka et al to utilize compression techniques. Note also that the apparatus and method of Blonstein et al represent mathematical algorithms associated with image compression and are unrelated to Applicant's system wherein, in combination, compressed images are transferred back and forth from a centralized database.

Based on the foregoing comments, Applicant believes all claims are in condition for allowance, and timely notice thereof is hereby solicited. Questions regarding this application may be directed to the undersigned attorney at the telephone and facsimile numbers provided.

Respectfully submitted,

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